



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

MAY 31 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John F. Krause, Regional Environmental Scientist
Bureau of Indian Affairs
Division of Environmental and Cultural Resources Management
2600 N. Central Avenue
Phoenix, AZ 85004

Re: Summary of Requirements
BIA Maintenance Shop, Owyhee, Nevada
Administrative Order – Docket No. UIC-EO-95-001

Dear Mr. Krause:

EPA Region 9 ("EPA") continues to review Bureau of Indian Affairs ("BIA") compliance with the SDWA Section 1431 Emergency Order issued to BIA on June 16, 1995. As you know, that Order ("Order") was issued to address concerns at a BIA maintenance shop located on the Duck Valley Reservation in Owyhee, Nevada (the "Facility") caused by the disposal of petroleum products and other wastes at the Facility, including into an injection well. We understand that BIA is currently reviewing its compliance with the Order in an attempt to finish up the remaining work items and/or request close-out of the Order by EPA. We also understand that a conference call will be scheduled to discuss BIA's review of its compliance with the Order.

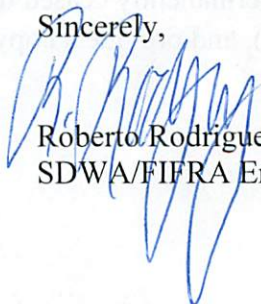
As we prepare for the conference call, we thought it would be useful to summarize the requirements of the Order and the information that we would need to determine compliance with the Order. Therefore, please provide either before or during the call the following information and/or documents:

- Verification that BIA has permanently ceased the injection or disposal of wastes fluids at the facility (Paragraph I.17), and provide a copy of the written certification, required by Paragraph I.17.c.

- Copies of all Work Plans submitted pursuant to Paragraphs II.18 and II.19 and II.E.40 of the Order.
- A description of all characterization and sampling work performed at the Facility pursuant to the Order, including location of samples and lab(s) used to analyze the samples, and provide copies of the report(s) with the results of sampling performed pursuant to the Order (Paragraphs II.A.22, II.A.24, II.A.25, and II.B.29-31 covering injection wells, storage areas, and the 16,000 gallon tank and pipeline).
- A description of all work, including but not limited to remediation work, performed pursuant to the Order to identify and address contamination. Such work should have included identification and closure of disposal wells (Paragraphs I.A.21-23, I.A.26), testing of the 16,000 gallon storage tank and pipeline (Paragraph II.B.28-29), identification and removal of waste drums or other storage containers (Paragraphs II.E.41-42), identification and remediation of standing pools of sludge and/or other contaminants (Paragraph II.E.42), and identification and remediation of subsurface soils and/or groundwater contamination (Paragraphs II.E.43-45).
- Provision of complete responses to the required information about the construction and operation of Water Wells #1-3, updated to the present, as required by Paragraphs II.D.35-36.
- Provision of complete responses to required information about the hydrogeology of the aquifer and the formation underlying the Facility and Drinking Water Wells #1-3, updated to the present, as required by Paragraphs II.D.37-38.
- Description of all sampling and work performed at the Drinking Water Wells #1-3 located at the Facility, including providing all well sample results since January 1, 2006 (Paragraph II.C.32), identification and location of all monitoring wells installed, including but not limited to Water Wells #1-3, along copies of the lab results of any samples taken from those wells during this time frame (Paragraph II.C.33-34).

We look forward to receiving this information and discussing the status of the Order at our upcoming call. To further discuss this letter or any of the required responses, please contact Hillary Hecht of my staff at (415) 947-4266.

Sincerely,



Roberto Rodriguez, Manager
SDWA/FIFRA Enforcement Office